

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

UNITED STATES OF AMERICA)
)
)
v.) **Criminal Case No. 1:19-CR-00009-JAW**
)
)
WILLIAM STEWART)

PROSECUTION VERSION OF THE OFFENSE

Beginning on a date unknown to the government but no later than May 30, 2018 and continuing until on about June 28, 2018, William Stewart possessed computer files containing images and videos of child pornography, which images and videos depicted actual prepubescent minors who were under the age of 12 years old. The defendant possessed these images and videos on his personal computer and on internal and external hard drives he connected to it. Both the computer and the hard drives were manufactured outside the state of Maine and had travelled in interstate and foreign commerce before being used by the defendant to download and store electronic images of child pornography.

The images and videos on the defendant's computer and hard drives showed actual minor children in sexually explicit poses, lasciviously displaying genitals, or engaged in sexual conduct with adult men. The images and videos travelled in interstate or foreign commerce before being received and possessed by the defendant. The defendant had used the internet to seek out and download these files, using peer-to-peer networks among other means, and knowingly kept the images on his computer and associated hard drives.

One such file downloaded and possessed by the defendant bears filename "Petite Brune 5 ans (3).mp4." This file is a 4 minute and 30 second video showing sexual relations between a prepubescent girl who appears to be five years old and an adult male who appears to be

recording the encounter from a first-person perspective. The video begins with the girl standing on a bed wearing pajamas and holding a piece of paper with “Matpreteen 4 you” written in green marker. The adult then takes the sign from the girl, and the girl removes all of her clothes and picks up a large bright pink sex toy from the bed. She takes the sex toy, which is shaped like a penis, and places the end of it in her mouth, and then places the end of it in her vulva. At the direction of the man holding the camera, she places the toy again in her mouth and then again back in her vulva. The girl then performs oral sex on the man, before he penetrates her vagina with his erect penis. Exhibit A includes four still frames from this video.

If this case were to proceed to trial, the government would have produced forensic evidence and expert testimony showing that the defendant used the computer to purposefully download and store child pornography, as well as law-enforcement testimony concerning the defendant’s admissions that he owned the computer and placed the child pornography on it. The government would have also produced the computer, the internal and external hard drives, the contraband images and videos found in it, and law enforcement and expert testimony concerning the ages of the victims and the country of manufacture of the electronic media the images were copied onto.

Dated: April 15, 2019

HALSEY B. FRANK
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UNITED STATES DISTRICT COURT
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CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2019, I electronically filed the above **Prosecution Version of the Offense** with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

Walter McKee, Esq.

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